

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ITZHAK BERZANI,

Plaintiff,

-against-

KEVIN J. ALONZO-CEVALLOS and
INRANGE SOLUTIONS II, LLC.,

Defendants.
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Docket #:

COMPLAINT

Plaintiff Demands
Trial by Jury

Plaintiff **Itzhak Berzani** by his attorneys **ROBINSON YABLON COOPER & BONFANTE, LLP** complaining of the defendants sets forth:

BASIS OF JURISDICTION & VENUE

1. The jurisdiction of this Court is predicated upon diversity of citizenship pursuant to 28 U.S.C. §1332, 28 U.S.C. §1391 (a)(2) and 28 U.S.C. §1391 (b)(2) as the dispute involves parties from different States, damages are in excess of this Court's jurisdictional limits and a substantial part of the events or omissions giving rise to the claim occurred in the Eastern District of New York.

IDENTITY OF PARTIES

2. The plaintiff Itzhak Berzani is a resident of New York.
3. The defendant Kevin J. Alonzo-Cevallos is a resident of New Jersey.
4. The defendant InRange Solutions II, LLC is a foreign limited liability company formed and operating in New Jersey.

5. That on August 17, 2021, plaintiff Itzhak Berzani was the owner and operator of a 2015 Lincoln motor vehicle bearing New York State license plate T710795C.

6. That on August 17, 2021, defendant Kevin J. Alonzo-Cevallos was the permissive operator of a 2021 Ford Wagon GY motor vehicle registered in New Jersey bearing license plate number B23NVK.

7. That on August 17, 2021, defendant InRange Solutions II, LLC was the owner of the aforementioned 2021 Ford Wagon GY motor vehicle registered in New Jersey bearing license plate number B23NVK being operated by defendant Kevin J. Alonzo-Cevallos.

8. That on and before August 17, 202, defendant Kevin J. Alonzo-Cevallos was an employee, agent and servant of defendant InRange Solutions II, LLC.

9. That on August 17, 2021, Kings Highway near its intersection with Avenue D in Brooklyn, New York was and still is a public roadway and thoroughfare.

10. That on August 17, 2021, plaintiff Itzhak Berzani was operating his motor vehicle and traveling at said location.

11. That on August 17, 2021, defendant Kevin J. Alonzo-Cevallos was operating the motor vehicle owned by defendant InRange Solutions II, LLC and traveling at said location.

12. That on August 17, 2021, on Kings Highway near its intersection with Avenue D in Brooklyn, New York, the motor vehicle operated by defendant Kevin J. Alonzo-Cevallos and owned by defendant InRange Solutions II, LLC violently collided into the rear of the vehicle owned and operated by plaintiff Itzhak Berzani.

13. That the aforementioned occurrence resulted in serious injuries to plaintiff Itzhak Berzani which were caused solely by the negligence, carelessness and recklessness of the defendants in their ownership, operation, maintenance and control of their motor vehicle.

14. That as a result of the aforementioned occurrence, plaintiff Itzhak Berzani sustained serious, disabling and permanent injuries; that he has suffered, still suffers and in the future will continue to experience severe pain and suffering; that he was confined to his bed, his home and prevented from pursuing his usual and customary activities of daily living; that he has been required to seek continuous medical care and treatment which will continue in the future; that she has incurred medical expenses and hospital expenses and will continue to sustain such expenses substantially into the future.

15. As a result of the negligence of defendants, plaintiff Itzhak Berzani suffered a “serious injury” as set forth in §5102(d) of the New York State Insurance Law and the economic loss to plaintiff Itzhak Berzani is greater than basic economic loss as defined by law.

16. That by reason of the foregoing, plaintiff Itzhak Berzani has been damaged in the sum of Seven Million Dollars (\$7,000,000.00) and demands judgment against the defendants.

WHEREFORE, plaintiff Itzhak Berzani demands judgment against the defendants Kevin J. Alonzo-Cevallos and InRange Solutions II, LLC in the sum of Seven Million Dollars (\$7,000,000.00) along with such other and further relief as may be granted by the Court, including but not limited to the costs and disbursements of this action.

Dated: New York, New York
April 7, 2022

**ROBINSON YABLON
COOPER & BONFANTE, LLP**
Attorneys for Plaintiff

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